

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	§	Chapter 11
	§	
BRAZOS ELECTRIC POWER	§	
COOPERATIVE, INC.,	§	Case No. 21-30725 (DRJ)
	§	
Debtor.	§	

**JOINT STIPULATION AMONG THE DEBTOR, THE PUBLIC UTILITY
COMMISSION OF TEXAS, AND
THE ELECTRIC RELIABILITY COUNCIL OF TEXAS
[Relates to Dkt. Nos. 1415 and 1416]**

Brazos Electric Power Cooperative, Inc. (the “Debtor”), debtor and debtor-in-possession in the above-referenced Chapter 11 case, the Public Utility Commission of Texas (the “PUCT”), the Electric Reliability Council of Texas (“ERCOT”, and together with the Debtor, the PUCT, the “Parties”), hereby enter into this stipulation (the “Stipulation”) and agree as follows:

1. On December 22, 2021, the Debtor served ERCOT with a *Notice of Examination Under Fed. R. Bankr. P. 2004* [Dkt. No. 1415] (the “ERCOT 2004 Request”).
2. On December 22, 2021, the Debtor served the PUCT with a *Notice of Examination Under Fed. R. Bankr. P. 2004* [Dkt. No. 1416] (the “PUCT 2004 Request”).
3. The Parties stipulate and agree that the deadline for the PUCT and the ERCOT to object, move for a protective order, or otherwise respond to their respective 2004 Requests is January 5, 2022.
4. The Stipulation is intended by the Parties to be binding upon their successors, agents, assigns, including bankruptcy trustees and estate representatives, and any parent, subsidiary, or affiliated entity of the Parties.

5. The Bankruptcy Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Stipulation.

STIPULATED AND AGREED TO THIS 28TH DAY OF DECEMBER, 2021:

<p>NORTON ROSE FULBRIGHT US LLP</p> <p>By: <u>/s/ Paul Trahan</u> Jason L. Boland (SBT 24040542) Julie G. Harrison (SBT 24092434) Maria Mokrzycka (SBT 24119994) 1301 McKinney Street, Suite 5100 Houston, TX 77010 Telephone: (713) 651-5151 Facsimile: (713) 651-5246 Email: jason.boland@nortonrosefulbright.com Email: julie.harrison@nortonrosefulbright.com Email: maria.mokrzycka@nortonrosefulbright.com</p> <p>Paul Trahan (SBT 24003075) 98 San Jacinto Boulevard, Suite 1100 Austin, TX 78701 Telephone: (512) 536 5288 Facsimile: (512) 536 4598 Email: paul.trahan@nortonrosefulbright.com</p> <p><i>Counsel for the Debtor and Debtor in Possession</i> -and-</p> <p>O'MELVENY & MYERS LLP Louis R. Strubeck, Jr. (SBT 19425600) Nick Hendrix (SBT 24087708) 2501 North Harwood Street Dallas, Texas 75201 Telephone: (972) 360-1925 Email: lstrubeck@omm.com Email: nhendrix@omm.com</p> <p><i>Co-Counsel for the Debtor and Debtor in Possession</i></p>	<p>KEN PAXTON Attorney General of Texas</p> <p>BRENT WEBSTER First Assistant Attorney General</p> <p>GRANT DORFMAN Deputy First Assistant Attorney General</p> <p>SHAWN E. COWLES Deputy Attorney General for Civil Litigation</p> <p>SEAN O'NEILL Assistant Attorney General Deputy Chief, Bankruptcy & Collections Division</p> <p>By: <u>/s/ Jason Binford</u> JASON B. BINFORD Texas State Bar No. 24045499 S. Dist. Bar No. 574720 LAYLA D. MILLIGAN Texas State Bar No. 24026015 S. Dist. Bar No. 38000 Office of the Attorney General of Texas Bankruptcy & Collections Division P. O. Box 12548 MC008 Austin, Texas 78711-2548 Tel: (512) 463-2173 Facsimile: (512) 936-1409 Email: jason.binford@oag.texas.gov layla.milligan@oag.texas.gov</p> <p>ATTORNEYS FOR THE PUBLIC UTILITY COMMISSION OF TEXAS</p>
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CERTIFICATE OF SERVICE

I certify that on December 28th, 2021, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for United States Bankruptcy Court for the Southern District of Texas.

/s/ Jason Binford
Jason B. Binford